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INTERVENTION

ORIGINAL

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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

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IN THE MATTER OF THE  
APPLICATION OF TUCSON ELECTRIC  
POWER COMPANY FOR APPROVAL  
OF ITS PLAN FOR STRANDED COST  
RECOVERY AND FOR RELATED  
APPROVALS, AUTHORIZATIONS AND  
WAIVERS

DOCKET NO. E-01933A-98-0471

IN THE MATTER OF THE FILING OF  
TUCSON ELECTRIC POWER  
COMPANY OF UNBUNDLED TARIFFS  
PURSUANT TO A.A.C. R14-2-1602 ET.  
SEQ.

DOCKET NO. E-01933A-97-0772

TUCSON ELECTRIC POWER  
COMPANY APPLICATION FOR  
APPROVAL OF ITS PROPOSED  
DIRECT ACCESS SERVICE FEES AND  
ITS PROPOSED AMENDMENTS TO ITS  
RULES AND REGULATIONS

DOCKET NO. E-01933A-99-0729

IN THE MATTER OF THE  
COMPETITION IN THE PROVISION OF  
ELECTRIC SERVICES THROUGHOUT  
THE STATE OF ARIZONA

DOCKET NO. RE-00000C-94-0165

**MOTION FOR LEAVE TO INTERVENE**

Arizonans for Electric Choice and Competition<sup>1</sup> hereby moves the Arizona

<sup>1</sup> Arizonans for Electric Choice and Competition is a coalition of energy consumers in favor of competition and includes Cable Systems International, BHP Copper, Motorola, Chemical Lime, Intel, Honeywell, Allied Signal, Cyprus Climax Metals, Asarco, Phelps Dodge, Homebuilders of Central Arizona, Arizona Mining Industry Gets Our Support, Arizona Food Marketing Alliance, Arizona Association of Industries, Arizona Multihousing Association, Arizona Rock Products Association, Arizona Restaurant Association, Arizona

1 Corporation Commission ("Commission"), pursuant to Arizona Rules of Civil  
2 Procedure and A.A.C. R14-3-105 for leave to intervene in the above-captioned  
3 proceeding.

4       Arizonans for Electric Choice and Competition ("AECC") is a coalition of  
5 industrial users, commercial users, and association users of electricity provided by  
6 Tucson Electric Power Company ("TEP"). AECC has participated in the proceedings  
7 involving the adoption of the Commission's Retail Electric Competition Rules (A.A.C.  
8 R14-2-1601, et. seq.) ("Rules") and various amendments to those Rules. AECC also  
9 participated in the TEP Settlement Agreement as approved and modified by Decision  
10 No. 62103 (November 30, 1999) and, in fact, was a signator to the Agreement. As  
11 a consequence, AECC has a direct and substantial economic interest in the instant  
12 proceeding. AECC's participation in said proceeding will neither unduly broaden the  
13 issues to be addressed therein nor delay the conduct thereof.

14       Copies of all notices, pleadings, exhibits and Orders in this subject proceeding  
15 should be sent to:

16                   C. Webb Crockett, Esq.  
17                   Jay Shapiro, Esq.  
18                   FENNEMORE CRAIG, P.C.  
19                   3003 North Central, Suite 2600  
20                   Phoenix, AZ 85012-2913

21       Wherefore, in view of the foregoing, Arizonans for Electric Choice and  
22 Competition respectfully request that the Commission grant AECC's Request for  
23 Leave to Intervene in the above proceeding and that AECC be afforded the full  
24 status of an intervenor under the Commission's rules and regulations.

25  
26       Association, Boeing, Arizona School Board Association, National Federation of Independent  
Business, Arizona Hospital Association, Lockheed Martin, Abbot Labs, and Raytheon.

1 RESPECTFULLY SUBMITTED July 31, 2000.

2 FENNEMORE CRAIG, P.C.

3  
4 By 

C. Webb Crockett  
Jay L. Shapiro  
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Attorneys for Arizonans for Electric Choice  
and Competition

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6  
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8  
9 ORIGINAL AND TEN COPIES  
10 of the foregoing hand-delivered  
this 31<sup>st</sup> day of July, 2000, to:

11 Arizona Corporation Commission  
12 Docket Control  
13 1200 West Washington Street  
Phoenix, Arizona 85007

14 COPY OF THE FOREGOING  
15 hand-delivered this 31st day  
16 of July, 2000 to:

17 Jerry L. Rudibaugh, Chief Hearing Officer  
Hearing Division  
18 ARIZONA CORPORATION COMMISSION  
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